

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Friends of the Earth and Sierra Club,)	SOUTHERN ALLIANCE FOR
Complainant / Petitioner v. South Carolina)	CLEAN ENERGY'S FIRST AND
Electric & Gas Company,)	CONTINUING REQUEST FOR
Defendant/Respondent)	PRODUCTION OF DOCUMENTS

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Request of the South Carolina Office of)	SOUTHERN ALLIANCE FOR
Regulatory Staff for Rate Relief to SCE&G)	CLEAN ENERGY'S FIRST AND
Rates Pursuant to S.C. Code Ann. § 58-27-)	CONTINUING REQUEST FOR
920)	PRODUCTION OF DOCUMENTS

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Joint Application and Petition of South)	SOUTHERN ALLIANCE FOR
Carolina Electric & Gas Company and)	CLEAN ENERGY'S FIRST AND
Dominion Energy, Incorporated for Review)	CONTINUING REQUEST FOR
and Approval of a Proposed Business)	PRODUCTION OF DOCUMENTS
Combination between SCANA Corporation)	
and Dominion Energy, Incorporated, as May)	
Be Required, and for a Prudency)	
Determination Regarding the Abandonment)	
of the V.C. Summer Units 2 & 3 Project and)	
Associated Customer Benefits and Cost)	
Recovery Plan)	

**TO: K. CHAD BURGESS, ESQ., AND MATTHEW W. GISSENDANNER, ESQ.,
REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC & GAS
COMPANY:**

The South Carolina Coastal Conservation League ("CCL") and the Southern Alliance for Clean Energy ("SACE"), as intervenors and parties of record in the above-captioned actions, request, pursuant to South Carolina Public Service Commission Rule 103-833.B, that South Carolina Electric & Gas Company ("SCE&G") respond to the

following Requests for Production under oath and to serve the responses to these requests within twenty (20) days.

DEFINITIONS AND INSTRUCTIONS

1. “You” and “your” includes South Carolina Electric & Gas Company and any of its representatives, owners, employees, members, attorneys, or agents.

2. If any privilege is claimed with respect to any requested item, the identification of which would otherwise be required by these requests, with respect to each document and oral communication for which a privilege is claimed, you shall:

a) identify the date thereof;

b) state the particular privilege believed applicable and concisely state sufficient facts to support the claim of privilege; and

c) if the privilege is asserted with respect to a document, identify all persons to whom its contents were disclosed, including all recipients thereof.

REQUESTS

1. Please produce copies of all responses to the discovery requests submitted to SCE&G by all parties of record to Docket No. 2017-370-E. To the extent those documents have been made previously available or are otherwise available in electronic format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

2. Please produce copies of all responses to the discovery requests submitted to SCE&G by all parties of record to Docket No. 2017-305-E. To the extent those documents have been made previously available or are otherwise available in electronic

format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

3. Please produce copies of all responses to the discovery requests submitted to SCE&G by Friends of the Earth and Sierra Club and all other parties of record to Docket No. 2017-207-E. To the extent those documents have been made previously available or are otherwise available in electronic format, CCL and SACE would prefer to receive electronic access to such documents. In responding to this request, provide all responses heretofore submitted or submitted hereafter.

These Requests shall be deemed to continue from the time of service until the time of final disposition of this matter by the Commission so that information sought, which comes to the knowledge of a party, or its attorney, after original Responses to these Requests have been submitted, shall be promptly supplemented.

Respectfully submitted,



William C. Cleveland (SC Bar No. 79051)
 J. Blanding Holman, IV (SC Bar No. 72260)
 Elizabeth Jones (SC Bar No. 102748)
 SOUTHERN ENVIRONMENTAL LAW CENTER
 463 King Street, Suite B
 Charleston, SC 29403
 Telephone: (843) 720-5270
 Fax: (843) 720-5240

*Attorneys for South Carolina Coastal
 Conservation League and the Southern
 Alliance for Clean Energy*

May 21, 2018

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Friends of the Earth and Sierra Club,)	SOUTHERN ALLIANCE FOR
Complainant / Petitioner v. South Carolina)	CLEAN ENERGY'S FIRST AND
Electric & Gas Company,)	CONTINUING REQUEST FOR
Defendant/Respondent)	PRODUCTION OF DOCUMENTS

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Request of the South Carolina Office of)	SOUTHERN ALLIANCE FOR
Regulatory Staff for Rate Relief to SCE&G)	CLEAN ENERGY'S FIRST AND
Rates Pursuant to S.C. Code Ann. § 58-27-)	CONTINUING REQUEST FOR
920)	PRODUCTION OF DOCUMENTS

IN RE:)	SOUTH CAROLINA COASTAL
)	CONSERVATION LEAGUE AND
Joint Application and Petition of South)	SOUTHERN ALLIANCE FOR
Carolina Electric & Gas Company and)	CLEAN ENERGY'S FIRST AND
Dominion Energy, Incorporated for Review)	CONTINUING REQUEST FOR
and Approval of a Proposed Business)	PRODUCTION OF DOCUMENTS
Combination between SCANA Corporation)	
and Dominion Energy, Incorporated, as May)	
Be Required, and for a Prudency)	
Determination Regarding the Abandonment)	
of the V.C. Summer Units 2 & 3 Project and)	
Associated Customer Benefits and Cost)	
Recovery Plan)	

I certify that the following persons have been served with a copy of the First and Continuing Request of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy, by electronic mail, at the addresses set forth below:

Jeffrey M. Nelson
 Shannon Bowyer Hudson
 Jenny R. Pittman
 Nanette S. Edwards
 Office of Regulatory Staff
 1401 Main Street, Suite 900
 Columbia, SC 29201
 jnelson@regstaff.sc.gov
 shudson@regstaff.sc.gov
 jpittman@regstaff.sc.gov
 nsedwar@regstaff.sc.gov

K. Chad Burgess.
 Matthew W. Gissendanner
 South Carolina Electric & Gas Company
 220 Operation Way – MC C222
 Cayce, SC 29033
 chad.burgess@scana.com
 matthew.gissendanner@scana.com

Robert Guild
 314 Pall Mall
 Columbia, SC 29201
 bguild@mindspring.com

William T. Dowdey
 William T. Dowdey
 811 Jefferson Street
 West Columbia, SC 29169
 wtdowdey@gmail.com

Lynn Teague
 3728 Wilmot Avenue
 Columbia, SC 29205
 803-556-9802
 TeagueLynn@gmail.com

Stephanie U. Eaton
 Spilman Thomas & Battle, PLLC
 110 Oakwood Drive, Suite 500
 Winston-Salem, NC 27103
 336-631-1062
 seaton@spilmanlaw.com

Mitchell Willoughby
 Willoughby & Hoefer, P.A.
 Post Office Box 8416
 Columbia, SC 29202
 803-252-3300
 mwilloughby@willoughbyhoefer.com

Lara B. Brandfass
 Spilman Thomas & Battle, PLLC
 300 Kanawha Blvd., East
 Charleston, SC 53501
 lbrandfass@spilmanlaw.com

J. David Black
 Nexsen Pruet, LLC
 Post Office Drawer 2426
 Columbia, SC 29202
 803-540-2072
 DBlack@nexsenpruet.com

Emily W. Medlyn
 U.S. Army Legal Services Agency -
 Regulatory Law
 9275 Gunston Road
 Fort Belvoir, VA 22060
 703-614-3918
 emily.w.medlyn.civ@mail.mil

Derrick Price Williamson
 Spilman Thomas & Battle, PLLC
 1100 Bent Creek Blvd., Suite 101
 Mechanicsburg, PA 17050
 717-795-2740
 dwilliamson@spilmanlaw.com

Belton T. Zeigler
 Womble Bond Dickinson (US) LLP
 1221 Main Street, Suite 1600
 Columbia, SC 29201
 803-454-7720
 belton.zeigler@wbd-us.com

Alexander G. Shissias
 The Shissias Law Firm, LLC
 1727 Hampton Street
 Columbia, SC 29201
 803-540-3090
 alex@shissiaslawfirm.com

Damon E. Xenopoulos
 Stone Mattheis Xenopoulos & Brew, P.C.
 1025 Thomas Jefferson Street, N.W.
 Eighth Floor, West Tower
 Washington, DC 20007
 DEX@smxblaw.com

Frank Knapp, Jr.
 118 East Selwood Lane
 Columbia, SC 29212
 803-765-2210
 fknapp@knappagency.com

James F. Walsh, Jr.
 1436 Amelia Street
 Orangeburg, SC 29116
 803-534-6061
 jfwwalsh@bellsouth.net

James N. Horwood
 Peter J. Hopkins
 Stephen C. Pearson
 Jessica R. Bell
 Spiegel & McDiarmid LLP
 1875 Eye Street, NW
 Suite 700
 Washington, DC 20006
 202-879-4000
 james.horwood@spiegelmc.com
 peter.hopkins@spiegelmc.com
 steve.pearson@spiegelmc.com
 jessica.bell@spiegelmc.com

Joseph K. Reid III
 Elaine S. Ryan
 Ellen T. Ruff
 Robert A. Muckenfuss
 McGuire Woods LLP
 201 North Tryon Street
 Suite 3000
 Charlotte, NC 28202
 704-343-2000
 jreid@mcguirewoods.com
 eryl@mcguirewoods.com
 eruff@mcguirewoods.com
 rmuckenfuss@mcguirewoods.com

Lisa S. Booth
 Tracey A. Huang
 Irene Scouras
 Dominion Energy Services, Inc.
 120 Tredegar Street, Riverside 2
 Richmond, VA 23233
 804-819-2288
 lisa.s.booth@dominionenergy.com
 tracey.a.huang@dominionenergy.com
 irene.scouras@dominionenergy.com

Robert E. Tyson, Jr.
 Sowell Gray Robinson Stepp & Laffitte,
 LLC
 Post Office Box 11449
 Columbia, SC 29201
 rtyson@sowellgray.com

Michael J. Anzelmo
 Chief of Staff and Legal Counsel to the
 Speaker
 Post Office Box 11867
 Columbia, SC 29211
 michaelanzelmo@schouse.gov

Frank R. Ellerbe, III
 Sowell Gray Robinson Stepp & Laffitte,
 LLC
 Post Office Box 11449
 Columbia, SC 29201
 803-227-1112
 fellerbe@sowellgray.com

John H. Tiencken, Jr.
 Christopher S. McDonald
 The Tiencken Law Firm, LLC
 234 Seven Farms Drive, Suite 114
 Charleston, SC 29492
 843-377-8415
 jtiencken@tienckenlaw.com
 cmcdonald@tienckenlaw.com

Michael N. Couick
 Christopher R. Koon
 The Electric Cooperatives of South
 Carolina, Inc.
 808 Knox Abbott Drive
 Cayce, SC 29033
 803-739-3034
 mike.couick@ecsc.org
 chris.koon@ecsc.org

Robert D. Cook, Solicitor General
 J. Emory Smith, Jr., Deputy Solicitor
 General
 Post Office Box 11549
 Columbia, SC 29211
 (803) 734-3680
 BCook@scag.gov
 ESmith@scag.gov

Susan B. Berkowitz
 South Carolina Appleseed Legal Justice
 Center
 Post Office Box 7187
 Columbia, SC 29202
 (803) 779-1113
 sberk@scjustice.org

John B. Coffman
 871 Tuxedo Blvd.
 Webster Groves, MO 63119
 (573) 424-6779
 john@johncoffman.net

Richard L. Whitt
 Timothy F. Rogers
 Austin & Rogers, PA
 508 Hampton Street, Suite 300
 Columbia, SC 29201
 (803) 256-4000
 RLWhitt@AustinRogersPA.com
 tfrogers@austinrogerspa.com
 CASchurg@AustinRogersPA.com

Scott Elliott
 Elliott & Elliott, P.A.
 1508 Lady Street
 Columbia, SC 29201
 (803) 771-0555
 selliot@elliottlaw.us
 linda@elliottlaw.us

James R. Davis
 J. Davis Law Firm
 BB&T Plaza, Suite 211B
 234 Seven Farms Drive, MB #16
 Daniel Island, SC 29492
 (843) 642-8333
 jim@jdavispc.com

Michael T. Rose
 Mike Rose Law Firm
 406 Central Avenue
 Summerville, SC 29483
 (843) 871-1821
 mike@mikeroselawfirm.com

W. Andrew Gowder, Jr.
 Austen & Gowder, LLC
 1629 Meeting Street, Suite A
 Charleston, SC 29405
 (843) 727-2229
 andy@austengowder.com

Dino Teppara
 104 Egret Court
 Lexington, SC 29072
 Dino.Teppara@gmail.com

Allen Mattison Bogan
B. Rush Smith, III
Carmen Harper Thomas
William C. Hubbard
Nelson Mullins Riley & Scarborough LLP
1320 Main Street/17th Floor
Columbia, SC 29201
rush.smith@nelsonmullins.com
matt.bogan@nelsonmullins.com
carmen.thomas@nelsonmullins.com
william.hubbard@nelsonmullins.com

Weston Adams, III
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, SC 29211
weston.adams@nelsonmullins.com

Camden N. Massingill
Matthew T. Richardson
Wallace K. Lightsey
Wyche Law Firm
801 Gervais Street, Suite B
Columbia, SC 29201
cmassingill@wyche.com
mrichardson@wyche.com

This the 21st day of May, 2018.

s/ A. Rachel Pruzin